

N^VN
Native Village of Nuiqsut
2205 2nd Avenue
P.O. Box 89169, Nuiqsut Alaska 99789
PHONE (907) 480-3010 **FAX** (907) 480-3009
EMAIL native.village@astacalaska.net

August 21, 2019

Racheal Jones, Project Lead
Alaska State Office
Bureau of Land Management (BLM)
222 West Seventh Avenue – Mailstop 13
Anchorage, Alaska 99513
rajones@blm.gov

Sent via email

Re: Request for Extension of Willow Draft EIS Comment Period

Dear Ms. Jones:

On behalf of the Native Village of Nuiqsut (NVN), a Bureau of Indian Affairs federally-recognized tribe, we request additional time to provide comments on the draft Environmental Impact Statement (EIS) for the proposed Willow Master Development Plan (MDP).

We understand that BLM intends to begin a 45-day comment period around the end of August. It is inappropriate for BLM to provide such a short comment period — the bare minimum required by law — during the fall months, when many of our tribal members are engaging in subsistence whaling activities and are unavailable to comment. This massive development proposal requires a significantly longer comment period so that our members and community can participate in an informed manner.

Our whalers travel to Cross Island in late August and early September to begin whaling. This roughly 80-mile journey takes them past the oil fields surrounding Prudhoe Bay and into the often icy waters of the Beaufort Sea. This hard work is rewarded when successful whaling captains and crews share the whale with our community and other villages at Thanksgiving and Christmas, and at Nalukataq. Our community's whaling efforts are critically important to feed our families and to continue practicing our culture and way of life. BLM is well aware of the timing and importance of whaling to our community; therefore, we are surprised the agency is planning to limit its brief comment period to a time when many of our members will be unable to review the EIS or attend the single public meeting in our community to discuss the proposal.

We have much to lose from the Willow proposal. We are already experiencing negative impacts from existing development in the region and are feeling the effects from infrastructure and development activities circling our community. This project will involve an entirely new central processing facility, an airstrip, a gravel mine, and an artificial gravel island offshore of Harrison

Bay — an area that is important for bowhead whales. The additional aircraft traffic, and offshore island construction, and barging alone are potentially significant to our community's subsistence hunting and whaling practices. This is all in addition to the pipelines, pads, and roads that will further encircle us. Our whaling captains will have critical input for the draft EIS and its analysis of impacts from the proposed gravel island, but will be unable to even read the document until they return to Nuiqsut from their hunt and our community harvest the whale. At that point, the comment period would likely be nearly over. BLM must provide an adequate amount of time for our community to consider and engage in the review of this project.

We respectfully request BLM extend this scoping comment by an additional 60 days, so that it would close at the end of December, to allow our community to review the draft EIS and meaningfully engage in the process. Also, we request that BLM avoid scheduling any public meetings or in-person government to government consultations in our community until the end of our whaling season, as well.

Respectfully,

Native Village of Nuiqsut


President, Margaret Pardue